



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

February 1, 2017

Ms. Leslie Patterson,
Remedial Project Manager
U.S. EPA, Region 5
Superfund Remedial Response, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: South Dayton Dump & LF, Moraine
Remediation Response
Correspondence
Remedial Response
Montgomery County
557000752003

Subject: Ohio Environmental Protection Agency (Ohio EPA) Response to Review of Ohio EPA Comments on the Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Operable Units 1 and 2, Dated July 26, 2016, South Dayton Dump & Landfill, Moraine, Ohio

Dear Ms. Patterson:

On January 11, 2017, Ohio EPA, Division of Environmental Response and Revitalization, received the Review of Ohio EPA Comments on the Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Operable Units 1 and 2, dated July 26, 2016. Ohio EPA is providing the following comments.

1. Ohio EPA largely concurs with the United States Environmental Protection Agency's (U.S. EPA's) comments and recommendations on the work plan. Regarding the ground water investigation, there are two outstanding comments that Ohio EPA requests U.S. EPA reconsider adding to U.S. EPA's comment letter.
 - a. A discussion should be provided addressing perched ground water on site, specifically as it relates to its potential for being a source of current and future ground water contamination. For example, it is stated in section 2.2.4 of the work plan, that a perched layer of saturated soil was observed at GP18-09. This area has known vinyl chloride contamination in the uppermost, shallow ground water zone. While perched ground water is stated to be transient and seasonal, there is a potential for it to act as a source for current and future ground water contamination.
 - b. Comments 50d & g: Ohio EPA agrees that ground water plumes migrating outside of Operable Unit 1 should be the primary focus for additional investigation; however, Ohio EPA disagrees that the ground water plumes identified in the central portions of the landfill do not need to be delineated as part of the RI/FS. Because there is no presumptive remedy (i.e., cap), ground water contamination in the central portions of the landfill should be fully delineated and investigated in order to evaluate potential remedies, and to identify source areas.

2. There are four outstanding recommendations regarding the risk assessment that Ohio EPA would like U.S. EPA to reconsider.
 - a. A minimum distance from a railroad was requested for inclusion in U.S. EPA's draft comment letter, comment number 44. This comment discusses the collection of background samples within the proposed floodplain soil sampling area. Please include the following statement rather than a minimum distance: *"Background samples should not be collected in areas impacted by site-related activities or other sources of contamination. Analyze background samples collected from the floodplain soil sampling area for both target analyte list (TAL) and target compound list (TCL) chemicals to determine if the sample locations are representative of background conditions or contamination. Samples that indicate contamination should be replaced with another sample from an appropriate background location."*

Also, it appears the floodplain sampling area may not be an appropriate background sampling area since it may be impacted by the site. This is discussed in U.S. EPA's draft comment 29a. For clarity, consider adding a reference to comment 29a in comment 44.

- b. There was an error in Ohio EPA's comment 68, from the September 1, 2016 letter. This comment has been incorporated as comment 54a in U.S. EPA's draft comment letter. To fix the error, please revise the second sentence to: *"Soil gas probes should be installed as close to the potential source as possible (i.e., near-source) in areas without an impermeable surface..."*
 - c. Ohio EPA comment 14, from the September 1, 2016 letter, requested additional toxicity characteristic leaching procedure (TCLP) testing. While ground water sampling may be appropriate to evaluate leaching, information regarding the nature of the waste within the landfill is needed to help determine an appropriate remedy. Section 2.2.4 of the work plan indicates that limited waste characterization sampling (i.e., TCLP testing) has been conducted during previous investigations; therefore, additional waste characterization should be conducted to address data gaps. Whether or not hazardous waste is present in the landfill is directly relevant to remedy evaluation. Please reconsider incorporating a comment stating that additional waste characterization sampling should be conducted.
 - d. Ohio EPA comment 42, from the September 1, 2016 letter, discussed that random samples do not take into account information from previous investigations, which have identified exposed waste at the surface.
 - i. To address this concern, consider adding an additional comment to U.S. EPA's comment 47. Please change the text of Table 5.1: Step 3.i., 4th bullet to:
"...samples are collected from areas where geophysical anomalies, leachate seeps, stains, discoloration, exposed waste, and stressed vegetation have been or

are identified, and will adjust the random sample location as needed to achieve this.”

- ii. In addition, it is not clear how exposure to waste located at the surface will be evaluated to determine human health and ecological risks. Please consider requesting a change to the text of section 7.0 to clarify how the risk of this exposure will be characterized.

If you have any questions, or would like to meet to discuss the concerns, please contact me at (937) 285-6456 or Madelyn.Adams@epa.ohio.gov.

Sincerely,



Madelyn Adams
Site Coordinator
Division of Environmental Response and Revitalization

MA/lis

cc: Leslie Patterson, U.S. EPA
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